

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED STATES SUGAR CORPORATION;
BECKER GROVES, INC.; BENGAL MOTORS,
INC.; BILL BRANCH CHEVROLET, INC.;
BIRDSALL, INC.; BRADFORD MARINE, INC.,
BREVARD COUNTY BOARD OF COUNTY
COMMISSIONERS; BRIDGESTONE/
FIRESTONE NORTH AMERICAN TIRE, LLC;
CAPELETTI BROTHERS ENTERPRISES, INC.;
CHEVRON ENVIRONMENTAL MANAGEMENT
COMPANY; CLEAN HARBORS
ENVIRONMENTAL SERVICES, INC.;
CLIFF BERRY, INC.; EVANS PROPERTIES,
INC.; EXXON MOBIL CORPORATION;
FREIGHTLINER TRUCKS OF SOUTH
FLORIDA, INC.; THE GOODYEAR TIRE &
RUBBER COMPANY; HARBOR BRANCH
OCEANOGRAPHIC INSTITUTION, INC.;
HARDRIVES OF DELRAY, INC.,
HOLLYWOOD LINCOLN MERCURY, INC.;
CITY OF HOMESTEAD; HYDRO ALUMINUM
ROCKLEDGE, LLC; JIM POWELL MOTORS,
INC.; J.W. CHEATHAM, INC.; KIRCHMAN OIL
CORPORATION; L.P. EVANS MOTORS
WPB, INC.; MERRILL-STEVENS DRY DOCK
COMPANY; MIAMI DADE COLLEGE;
MIAMI-DADE COUNTY; MONTENAY
POWER CORP.; MORSE OPERATIONS, INC.;
NEW HOPE SUGAR COMPANY; OKEELANTA
CORPORATION; PALM BEACH COUNTY
BOARD OF COUNTY COMMISSIONERS;
PNEUMO ABEX CORPORATION; PORT
EVERGLADES, DEPARTMENT OF BROWARD
COUNTY; RYBOVICH BOAT COMPANY,
LLLP, f/k/a SPENCER BOAT YARD; RYDER

05-61271

CIV - HUCK

MAGISTRATE JUDGE
SIMONTON

FILED
2008 JUN 29 PM 4:50
S.D. OF FLA.
F.L.

TRUCK RENTAL, INC.; SBG FARMS, INC.;)
SCHOOL BOARD OF BROWARD COUNTY,)
FLORIDA; SEARS, ROEBUCK, & CO.; SHELL)
OIL COMPANY; SOUTHEAST INTERSTATE)
SERVICES, INC.; SUNRISE FORD COMPANY;)
SYSCO FOOD SERVICES OF SOUTH)
FLORIDA, INC.; TARMAC AMERICA LLC;)
THYSSENKRUPP ELEVATOR CORPORATION)
f/k/a MIAMI ELEVATOR COMPANY;)
TIRE KINGDOM, INC.; TROPICAL)
SHIPPING AND CONSTRUCTION CO., LTD.;)
UNOCAL CORPORATION; VULCAN)
MATERIALS COMPANY; WALPOLE, INC.;)
WARREN WOOTEN FORD, INC.; FLORIDA)
DEPARTMENT OF TRANSPORTATION;)
BARRY PAUL; BARRY PAUL d/b/a BARRY'S)
WASTE OIL; BONNIE PAUL; and OIL)
CONSERVATIONISTS, INC.)
)
Defendants.)

COMPLAINT

Plaintiff, the United States of America, by the authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency ("EPA"), files this Complaint and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff, the United States of America, brings this civil action under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §§ 9606(a) and 9607(a). The United States seeks injunctive relief to remedy an imminent and substantial endangerment to human health and the environment arising out of the release or threatened release of hazardous

substances into the environment at a site in Davie, Broward County, Florida, known as the Florida Petroleum Reprocessors Superfund Site (the "Site"). The United States also seeks the recovery of response costs it has incurred and will incur for response actions performed at and in connection with the Florida Petroleum Reprocessors Superfund Site.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1345, and Sections 106(a), 107(a) and 113(b) of CERCLA, 42 U.S.C. §§ 9606(a), 9607(a), and 9613(b).

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c), and Sections 106(a) and 113(b) of CERCLA, 42 U.S.C. §§ 9606(a) and 9613(b), because the releases or threatened releases of hazardous substances that give rise to these claims occurred in this district and because the Florida Petroleum Reprocessors Superfund Site is located in this district.

THE SITE

4. The Florida Petroleum Reprocessors Superfund Site ("Site") comprises: the Florida Petroleum Reprocessors property located at 3211 S.W. 50th Avenue in Davie, Florida; an area along the south side of I-595 and east of the Florida Turnpike; and the aerial extent of groundwater contamination originating from these two source areas.

5. The Site, including the groundwater contamination, covers an area of approximately 870 acres in size and is generally bounded to the north by Peters Road, which divides the northern and southern portion of the current Peele-Dixie Wellfield, to the east by U.S. Route 441, to the south by Orange Drive, and to the west by the Florida

Turnpike.

6. The Florida Petroleum Reprocessors property ("FPR Facility") formerly contained a waste oil recycling operation approximately one acre in size.

7. Operations were conducted at the FPR Facility from 1979 through 1992 under various names, including Barry's Waste Oil, Oil Conservationist, Inc. ("OCI"), FPR, and South Florida Fuels. Operations included the collection of waste oil (e.g., used motor oil, surplus fuels, marine oils and slops, hydraulic oils, aviation oils, and fuels) from local automotive, agricultural, and marine industry. Incoming waste oils were generally filtered, graded according to water content, and stored on-site in large bulk tanks. The waste oil was typically sold as fuel or to other waste oil marketers. More than 15 million gallons of waste oil were processed at the FPR Facility.

8. Operations at the FPR Facility resulted in the contamination of surface and subsurface soils and groundwater by petroleum and volatile organic compounds ("VOCs").

9. The area along the south side of I-595 and east of the Florida Turnpike formerly contained the Starta Sales & Salvage junkyard.

10. The Starta Sales & Salvage junkyard operated from 1965 until 1974. Approximately 1,600 junk cars were stored on the property at one time, with some of the junk cars being dumped into a water-filled borrow pit along the west side of the property. Automobile salvage and service businesses continued to operate at this location until 1984.

11. The former junkyard property was acquired by the Florida Department of

Transportation (FDOT) in 1984 in advance of the construction of I-595 at this location in the late 1980s.

12. In 1986, solvent-related contaminants were detected in excess of federal and state drinking water standards by the City of Fort Lauderdale, Florida ("City") in water samples obtained from production wells in the southern portion of the current Peele-Dixie Wellfield ("Wellfield"). This prompted a series of investigations by EPA, the State, Broward County, and the City to assess the cause and extent of contamination.

13. The City implemented interim remedial measures consisting of pumping groundwater into unlined pits at the Wellfield.

14. In 1994 the City entered into an Administrative Order on Consent ("AOC") with EPA to address the contamination in the Wellfield and constructed an air stripping system to treat contaminated groundwater.

15. In response to a release or a substantial threat of a release of hazardous substances at or from the Site, in August 1995, EPA commenced a Remedial Investigation and Feasibility Study ("RI/FS") for the Site pursuant to 40 C.F.R. § 300.430.

16. In the Spring of 1996, EPA's Emergency Response and Removal program conducted an assessment of the abandoned FPR Facility. The FPR Facility contained 10 aboveground tanks and 24 drums in poor condition, which appeared to contain waste oil and wastewater. While the tanks and drums were within secondary containment areas, these structures had deteriorated. The contents of the tanks and drums were sampled, and the results indicated the presence of VOCs and other hazardous substances. EPA

determined that an immediate response action was warranted to address the imminent threat posed by the tanks and drums and to stabilize the facility pending further evaluation. As a result of this action, all of the tanks and an estimated 13,000 gallons of waste oil and 26,000 gallons of wastewater were removed from the Site. This work was completed in 1997 pursuant to an Administrative Order on Consent with U.S. Sugar Corporation.

17. EPA completed the field work for the Remedial Investigation (RI) for the FPR Site in April 1997, and issued an RI/FS report in June 1998.

18. EPA later began a process of additional Site characterization and evaluation of remedial alternatives.

19. A second round of the removal was conducted at the FPR Facility by the U.S. Sugar Corporation and others in 1999, to address the highly contaminated soils ranging from the surface to a depth of approximately 12 feet below ground surface ("bgs"). Contaminants removed included chlorinated VOCs and petroleum-related compounds. Approximately 6,000 tons of soil were removed for off-Site disposal. The excavations were filled in with clean soil.

20. A third round of the removal was started at the FPR Facility by the U.S. Sugar Corporation and others in November 2000, to address the documented deep soil contamination and a zone of residual dense nonaqueous-phase liquid ("DNAPL") in the northwestern portion of the FPR Facility.

21. EPA issued a Proposed Plan in June 2000 and a final Record of Decision (ROD) on March 1, 2001, embodying EPA's selection of the Remedial Action to be

implemented at the Site.

22. The Remedial Action selected by EPA includes: collection of contaminated groundwater via extraction wells; treatment of contaminated groundwater via air stripping and activated carbon; monitored natural attenuation of groundwater; protection of the Wellfield; and long-term monitoring of groundwater.

DEFENDANTS

23. Defendant United States Sugar Corporation is a corporation organized under the laws of Delaware.

24. Defendant Becker Groves, Inc. is a corporation organized under the laws of Florida.

25. Defendant Bengal Motors, Inc. is a corporation organized under the laws of Florida.

26. Defendant Bill Branch Chevrolet, Inc. is a corporation organized under the laws of Florida.

27. Defendant Birdsall, Inc. is a corporation organized under the laws of Florida.

28. Defendant Bradford Marine, Inc. is a corporation organized under the laws of Florida.

29. Defendant Brevard County Board of County Commissioners is a subdivision of the State of Florida.

30. Defendant Bridgestone/Firestone North American Tire, LLC is a corporation organized under the laws of Delaware.

31. Defendant Capeletti Brothers Enterprises, Inc. is a corporation organized under the laws of Florida.

32. Defendant Chevron Environmental Management Company is a corporation organized under the laws of California.

33. Defendant Clean Harbors Environmental Services, Inc. is a corporation organized under the laws of Massachusetts.

34. Defendant Cliff Berry, Inc. is a corporation organized under the laws of Florida.

35. Defendant Evans Properties, Inc. is a corporation organized under the laws of Florida.

36. Defendant Exxon Mobil Corporation is a corporation organized under the laws of New Jersey.

37. Defendant Freightliner Trucks of South Florida, Inc. is a corporation organized under the laws of Florida.

38. Defendant The Goodyear Tire & Rubber Company is a corporation organized under the laws of Ohio.

39. Defendant Harbor Branch Oceanographic Institution, Inc. is a corporation organized under the laws of Florida.

40. Defendant Hardrives of Delray, Inc. is a corporation organized under the laws of Florida.

41. Defendant Hollywood Lincoln Mercury, Inc. is a corporation organized under the laws of Florida.

42. Defendant City of Homestead is a subdivision of the State of Florida.
43. Defendant Hydro Aluminum Rockledge, LLC is a limited liability corporation organized under the laws of Delaware.
44. Defendant Jim Powell Motors, Inc. is a corporation organized under the laws of Delaware.
45. Defendant J. W. Cheatham, Inc. is a corporation organized under the laws of Florida.
46. Defendant Kirchman Oil Corporation is a corporation organized under the laws of Florida.
47. Defendant L.P. Evans Motors WPB, Inc. is a corporation organized under the laws of Florida.
48. Defendant Merrill-Stevens Dry Dock Company is a corporation organized under the laws of Florida.
49. Defendant Miami Dade College is a subdivision of the State of Florida.
50. Defendant Miami-Dade County is a subdivision of the State of Florida.
51. Defendant Montenay Power Corp. is a corporation organized under the laws of Florida.
52. Defendant Morse Operations, Inc. is a corporation organized under the laws of Florida.
53. Defendant New Hope Sugar Company is a corporation organized under the laws of Florida.
54. Defendant Okeelanta Corporation is a corporation organized under the

laws of Delaware.

55. Defendant Palm Beach County Board of County Commissioners is a subdivision of the State of Florida.

56. Defendant Pneumo Abex Corporation is a corporation organized under the laws of Delaware.

57. Defendant Port Everglades, Department of Broward County is a subdivision of the State of Florida.

58. Defendant Rybovich Boat Company, LLLP, f/k/a Spencer Boat Yard, is a limited liability partnership organized under the laws of Florida.

59. Defendant Ryder Truck Rental, Inc. is a corporation organized under the laws of Florida.

60. Defendant SBG Farms, Inc. is a corporation organized under the laws of Florida.

61. Defendant School Board of Broward County, Florida is a subdivision of the State of Florida.

62. Defendant Sears, Roebuck & Co. is a corporation organized under the laws of New York.

63. Defendant Shell Oil Company is a corporation organized under the laws of Delaware.

64. Defendant Southeast Interstate Services, Inc. is a corporation organized under the laws of Florida.

65. Defendant Sunrise Ford Company is a corporation organized under the

laws of Florida.

66. Defendant Sysco Food Services of South Florida, Inc. is a corporation organized under the laws of Delaware.

67. Defendant Tarmac America LLC, successor by merger to Tarmac Florida, Inc., is a corporation organized under the laws of Delaware.

68. Defendant ThyssenKrupp Elevator Corporation, f/k/a Miami Elevator Company, is a corporation organized under the laws of Delaware.

69. Defendant Tire Kingdom, Inc. is a corporation organized under the laws of Florida.

70. Defendant Tropical Shipping and Construction Co., Ltd. is a corporation organized under the laws of Florida.

71. Defendant Unocal Corporation is a corporation organized under the laws of California.

72. Defendant Vulcan Materials Company is a corporation organized under the laws of New Jersey.

73. Defendant Walpole, Inc. is a corporation organized under the laws of Florida.

74. Defendant Warren Wooten Ford, Inc. is a corporation organized under the laws of Florida.

75. Defendant Florida Department of Transportation (FDOT) is a subdivision of the State of Florida.

76. Barry Paul is a resident of the State of Georgia.

77. Barry Paul did business as Barry's Waste Oil in the State of Florida.
78. Bonnie Paul is a resident of the State of Georgia.
79. Oil Conservationists, Inc. is a defunct corporation organized under the laws of Florida.

CERCLA STATUTORY SCHEME

80. Section 104(a) of CERCLA, 42 U.S.C. § 9604(a), provides that whenever any hazardous substance, pollutant, or contaminant is released into the environment, or there is a substantial threat of such a release into the environment, the President is authorized to act, consistent with the national contingency plan, to remove or arrange for the removal of, and provide for remedial action relating to such hazardous substance, pollutant, or contaminant or take any other response measure consistent with the national contingency plan which the President deems necessary to protect the public health or welfare or the environment.

81. The President's authority under Section 104(a) of CERCLA, 42 U.S.C. § 9604(a), has been lawfully delegated to the Regional Administrator of Region IV of EPA.

82. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides that certain parties are liable for the United States' response costs incurred under CERCLA:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this section –

- (1) the owner and operator of a vessel or a facility,
- (2) any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of,
- (3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of

hazardous substances owned or possessed by such person, by any other party or entity, at any facility . . . owned or operated by another party or entity and containing such hazardous substances . . .

from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for—

(A) all costs of removal or remedial action incurred by the United States Government . . . not inconsistent with the national contingency plan

83. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides that interest on response costs incurred by the United States is recoverable.

84. Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), provides that in actions for recovery of costs, "the court shall enter a declaratory judgment on liability for response costs or damages that will be binding on any subsequent action or actions to recover further response costs or damages."

85. Section 106 of CERCLA, 42 U.S.C. § 9606(a), provides in pertinent part:

In addition to any other action taken by a State or local government, when the President determines that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance from a facility, he may require the Attorney General of the United States to secure such relief as may be necessary to abate such danger or threat, and the district court of the United States in the district in which the threat occurs shall have jurisdiction to grant such relief as the public interest and the equities of the case may require.

86. By Executive Order 12580 of January 23, 1987, the President's functions under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a) have been delegated to the Administrator of EPA.

GENERAL ALLEGATIONS

87. The Site is a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), because hazardous substances have come to be located there.

88. "Releases" and "threatened releases" of "hazardous substances," including VOCs, within the meaning of Sections 101(14) and 101(22) of CERCLA, 42 U.S.C. §§ 9601(14) and 9601(22), occurred at the Site during and after operation of the Site.

89. Each of the defendants named in Paragraphs 23-73 sent waste oil to the FPR Facility and therefore arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such defendant, at the Site, and/or is legally responsible for another person's having arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, at the Site.

90. Each of the defendants named in Paragraphs 23-73 is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

91. Each of the defendants named in Paragraphs 23-73 is a liable party under Section 107(a)(3) of CERCLA, 42 U.S.C. § 9607(a)(3).

92. Defendant Florida Department of Transportation is the "owner," within the meaning of Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), of part of the Site.

93. Defendant Florida Department of Transportation is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

94. Defendant Florida Department of Transportation is a liable party under Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1).

95. Defendant Barry Paul, as an individual and doing business as Barry's

Waste Oil, was the "owner or operator," within the meaning of Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), of a portion of the Site at the time of disposal of hazardous substances.

96. Defendant Barry Paul, as an individual and doing business as Barry's Waste Oil, is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

97. Defendant Barry Paul, as an individual and doing business as Barry's Waste Oil, is a liable party under Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2).

98. Defendant Bonnie Paul was the "owner or operator," within the meaning of Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), of a portion of the Site at the time of disposal of hazardous substances.

99. Defendant Bonnie Paul is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

100. Defendant Bonnie Paul is a liable party under Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2).

101. Defendant Oil Conservationists, Inc. was the "owner or operator," within the meaning of Section 101(20)(A) of CERCLA, 42 U.S.C. § 9601(20)(A), of the Site at the time of disposal of hazardous substances.

102. Defendant Oil Conservationists, Inc. is a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

103. Defendant Oil Conservationists, Inc. is a liable party under Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2).

104. In response to releases or threats of releases at the Site, EPA has conducted "response actions" at the Site within the meaning of Section 101(25) of CERCLA, 42 U.S.C. § 9601(25), including removal actions.

105. The costs incurred by the United States as a result of the releases or threatened releases of hazardous substances at the Site are "response" costs within the meaning of Sections 101(25) and 107(a) of CERCLA, 42 U.S.C. §§ 9601(25) and 9607(a).

106. The response costs incurred by the United States were incurred in a manner not inconsistent with the National Contingency Plan, 40 C.F.R. Part 300, promulgated under Section 105 of CERCLA, 42 U.S.C. § 9605.

107. As of April 30, 2005, the United States has incurred response costs of at least \$6.2 million, exclusive of interest, as a result of the releases or threatened releases of hazardous substances at or from the Site.

108. Pursuant to Section 107(a), 42 U.S.C. § 9607(a), interest on past expenditures is accruing and will continue to accrue. Pursuant to Section 107(a), interest began to accrue on April 16, 2001, the date EPA sent a Special Notice of Liability/ Demand letter to Defendants.

CLAIM ONE

109. Paragraphs 1 through 106 are realleged and incorporated herein.

110. Pursuant to Section 104(a) of CERCLA, 42 U.S.C. § 9604(a), the United States has undertaken response actions at the Site and has incurred response costs, within the meaning of Section 101(25) of CERCLA, 42 U.S.C. § 9601(25), in response to the release or threatened release of hazardous substances into the environment from the Site,

within the meaning of Section 101(14) and (22) of CERCLA, 42 U.S.C. § 9601(14) and (22).

111. Defendants are liable to Plaintiff pursuant to Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1), for all of Plaintiff's previously unreimbursed response costs incurred in connection with the Site, for interest on those costs, and, pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), for all of Plaintiff's future response costs, if any, incurred in connection with the Site.

CLAIM TWO

112. Paragraphs 1 through 106 are realleged and incorporated herein.

113. EPA has determined that there is or may be an imminent and substantial endangerment to the public health or welfare or the environment because of the actual and/or threatened releases of hazardous substances at and from the Site.

114. In order to abate the conditions at the Site that present or may present an imminent and substantial endangerment to the public health or welfare or the environment, the Remedial Action selected by EPA in the Record of Decision dated March 1, 2001 must be implemented.

115. The Defendants are liable to perform the work required to implement the Remedial Action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court:

1. Pursuant to Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1), enter a judgment against Defendants in favor of Plaintiff for all response costs incurred by

Plaintiff in connection with the Site, including interest;

2. Pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), enter declaratory judgment on liability against Defendants in favor of Plaintiff for all future response costs incurred by Plaintiff in connection with the Site;

3. Pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606, order Defendants to perform the work required to implement the Remedial Action selected by EPA in the Record of Decision dated March 1, 2001, in order to abate the conditions at the Site that may present an imminent and substantial endangerment to the public health or welfare or the environment;

4. Award the United States the costs of this action; and,

5. Grant such other relief as this Court may deem just and proper.

Respectfully submitted, _


JOHN C. CRUDEN
Deputy Assistant Attorney General

AMY R. GILLESPIE
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Phone: 202/616-8754
Facsimile: 202/514-2583

R. ALEXANDER ACOSTA
Interim United States Attorney
Southern District of Florida

Marilynn K. Lindsey
Assistant U.S. Attorney
U.S. Attorney's Office
500 East Broward Blvd., Seventh Floor
Fort Lauderdale, FL 33394
Phone: 954/356-7255
Facsimile: 954/356-7336

OF COUNSEL:
Rudolph Tanasijevich
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303